

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

JOSEPH L. DIEBOLD, JR. on behalf of the)
EXXONMOBIL SAVINGS PLAN, and)
PAUL J. HUNDT, on behalf of the TEXAS)
INSTRUMENTS 401(K) SAVINGS PLAN,)
and all others similarly situated,)

Plaintiffs,)

V.)

NORTHERN TRUST INVESTMENTS,)
N.A. and THE NORTHERN TRUST)
COMPANY,)

Defendants.)

CIVIL ACTION NO. 09-CV-1934

Hon. Charles Norgle

**CO-LEAD CLASS COUNSEL’S UNOPPOSED MOTION FOR AN AWARD
OF ATTORNEY’S FEES, REIMBURSEMENT OF EXPENSES AND PAYMENT OF
INCENTIVE AWARDS TO THE REPRESENTATIVE PLAINTIFFS**

Co-Lead Class Counsel, Bailey & Glasser, LLP, Berger & Montague, P.C. and Peiffer
Rosca Wolf Abdullah Carr & Kane, APLC, move the Court for an Order:

- (a) awarding attorney's fees in the amount of one-third of the settlement;
- (b) awarding reimbursement of litigation expenses in the amount of \$260,644.65; and
- (c) awarding the two Named Plaintiffs in this action, Joseph Diebold and Paul J. Hundt, awards of \$10,000 each for their contributions to this case on behalf of the Class.

This motion incorporates by reference the facts recited and the legal precedents and arguments cited in Plaintiffs' Memorandum in Support of Co-Lead Class Counsel's Unopposed Motion for Award of Attorney's Fees, Reimbursement of Expenses and Payment of Incentive Awards to the Representative Plaintiffs and the Declarations of Todd S. Collins, Joseph Diebold, Paul J. Hund, and Kenneth A. Wexler and the exhibits thereto.

Dated: June 19, 2015

Respectfully submitted:

/s/ Todd S. Collins
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